

EXHIBIT 13

MAO DECLARATION OPPOSITION TO MOTION TO STRIKE

Ryan Sila

From: Ryan Sila (via waagoogleteam list) <waagoogleteam@simplelists.susmangodfrey.com>
Sent: Wednesday, January 15, 2025 4:00 PM
To: FIREBASE-WFGE
Cc: WAA Google Team
Subject: Rodriguez: Damages Discovery

EXTERNAL Email

Counsel —

In the motion to strike, Google states that it would require certain additional discovery regarding the disclosures at issue in the motion. Dkt. 442 at 10. In particular, Google states that it would need to depose Mr. Lasinski again and prepare another rebuttal expert report. Although the disclosures are based entirely on materials discussed in Mr. Lasinski's initial report (plus data Google produced in 2024), Plaintiffs agree to accommodate both requests. Please send dates on which Google's counsel is available to take Mr. Lasinski's deposition. We will work to find the earliest date that works for Plaintiffs' counsel and Mr. Lasinski. Plaintiffs also confirm that we have no objection to a supplemental expert rebuttal report.

Thanks,
Ryan

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